



February 14, 2006

MUR # 5708

Office of General Counsel
Federal Elections Commission
999 E Street N.W.
Washington, D.C. 20463

2006 FEB 22 A 9:25

FEDERAL ELECTIONS
COMMISSION
OFFICE OF GENERAL
COUNSEL

Dear Counsel:

Enclosed please find TheRestofUs.org's complaint against Jack Abramoff for violating federal campaign laws. Also enclosed are three (3) copies of said complaint and the required affidavit, signed by Edward Wigglesworth, an analyst for TheRestofUs.org. If you do not find the complaint sufficient, please inform us and we will make it sufficient. We can be reached by phone or mail at the number and address below.

Regards,

Edward Wigglesworth, Analyst
TheRestofUs.org

26044150525



FEDERAL ELECTIONS COMMISSION

In the Matter of Jack Abramoff, Respondent:

MUR No.: 5708

COMPLAINT

1. TheRestofUs.org brings this complaint against Mr. Jack Abramoff for the following violation:

contributing \$34,750 to federal candidates and committees in 2002, in violation of the \$25,000 aggregate yearly limit on contributions to federal candidates and committees set forth in 2 U.S.C. Section 441a(a)(3) prior to its amendment by the 2002 Bipartisan Campaign Reform Act.

We respectfully petition the FEC for a timely investigation and enforcement action against Mr. Abramoff for violating federal campaign law.

COMPLAINANT

2. This complaint is brought by TheRestofUs.org, a nonpartisan, nonprofit organization based at the following address:

1107 9th Street
Suite 601
Sacramento, CA 95814

We can be reached at (916) 446-4741.

RESPONDENT

3. TheRestofUs.org brings this complaint against Jack Abramoff, who upon information and belief based on FEC filing records, resides in Silver Springs, Maryland.

FACTS

4. According to records filed with the Federal Elections Commission (FEC) and made available on the FEC website, Mr. Jack Abramoff made the following contributions to federal candidates and committees in 2002:

- a) On February 21: \$1,000 to James Inhofe for U.S. Senate, FEC ID# C00207993; [\[File Image\]](#)
- b) On March 21: \$2,000 (two \$1,000 contributions) to Tim Hutchinson for U.S. Senate, FEC ID# C00319822; [\[File Image - \\$1,000\]](#), [\[File Image - \\$1,000\]](#)
- c) On March 25, \$500 to Tom Young for U.S. Representative, FEC ID# C00374249; [\[File Image\]](#)
- d) On March 30: \$1,000 to Heather Wilson for U.S. Representative, FEC ID# C00334060; [\[File Image\]](#)
- e) On April 22, \$250 to Bill Janklow for U.S. Representative, FEC ID# C00375428; [\[File Image\]](#)
- f) On April 25: \$5,000 to Americans for a Republican Majority PAC, FEC ID# C00292946; [\[File Image\]](#)
- g) On May 6: \$1,000 to Dan Burton for U.S. Representative, FEC ID# C00145862; [\[File Image\]](#)
- h) On May 22: \$1,000 (contributions of \$750 and \$250) to Robert Simmons for U.S. Representative, FEC ID# C00343921; [\[File Image - \\$750\]](#), [\[File Image - \\$250\]](#)
- i) On June 10: \$5,000 to Battle Born Classic Committee, FEC ID# C00370296; [\[File Image\]](#)
- j) On June 12: \$1,000 to Jim Talent for U.S. Senate, FEC ID# C00368183; [\[File Image\]](#)
- k) On June 25: \$5,000 to Senate Victory Fund PAC, FEC ID# C00202861; [\[File Image\]](#)
- l) On June 26: \$1,000 to Carolyn Grant for U.S. Representative, FEC ID# C00373324; [\[File Image\]](#)
- m) On July 29: \$1,000 to Eric Cantor for U.S. Representative, FEC ID# C00355461; [\[File Image\]](#)
- n) On September 30: \$500 to Butch Otter for U.S. Representative, FEC ID# C00345967; [\[File Image\]](#)
- o) On September 30: \$1,000 to Ted Stevens for U.S. Senate, FEC ID# C00028316; [\[File Image\]](#)
- p) On October 15: \$1,000 to Kimo Kaloi for U.S. Representative, FEC ID# C00382812; [\[File Image\]](#)
- q) On October 18: \$1,000 to Connie Morella for U.S. Representative, FEC ID# C00198614; [\[File Image\]](#)
- r) On October 22: \$1,000 to Michael Simpson for U.S. Representative, FEC ID# C00331397; [\[File Image\]](#)
- s) On October 24: \$1,000 to Charles Pickering for U.S. Representative, FEC ID# C00308577; [\[File Image\]](#)
- t) On October 29: \$500 to Phil Gingrey for U.S. Representative, FEC ID# C00370783; [\[File Image\]](#)

- u) On November 2: \$1,000 to Saxby Chambliss for U.S. Senate, FEC ID# C00266932; [\[File Image\]](#)
- v) On November 25: \$3,000 (three contributions of \$1,000) to Suzanne Haik Terrell for U.S. Senate, FEC ID# C00380212 [\[File Image\]](#)

5. Upon information and belief, all these committees are federal committees and any contribution to these committees counts toward the aggregate limit set forth in 2 U.S.C. 441a(a)(3).

6. The contributions to federal committees which are listed above total \$34,750 for the year 2002, violating the \$25,000 aggregate limit set forth in 2 U.S.C. §441a(a)(3), which was applicable prior to the implementation of the Bipartisan Campaign Reform Act of 2002.

7. The filings for the Hutchinson for Senate Committee list two \$1,000 contributions from Mr. Abramoff to the Committee for the primary, contrary to the \$1,000 limit on contributions to a federal candidate per election set forth in 2 U.S.C. §441a(a)(1)(A).

8. In the filings, Mr. Abramoff listed the following addresses:

800 Connecticut Ave., NW #500
Washington, D.C. 20006-2709

1735 New York Ave., NW #500
Washington, D.C. 20006

9. In the filings, Mr. Abramoff listed the following employers:

-Greenberg Traurig (various spellings)
-Preston, Gates & Ellis (various spellings)
-Self-employed

10. In the filings, Mr. Abramoff listed the following occupations:

-Attorney
-Lobbyist
-Government Affairs
-Government Relations Consultant
-Senior Director

11. In the filings, Mr. Abramoff lists different employers and occupations for the same address, suggesting the possibility that either Mr. Abramoff intentionally misstated his information or that campaign staff for the various recipient committees failed to use their best efforts to obtain and accurately relate Mr. Abramoff's information.

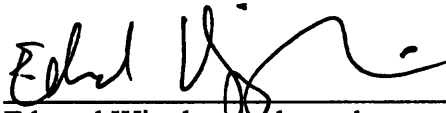
EFFECT OF BCRA

12. On March 27, 2002, President Bush signed into law the Bipartisan Campaign Reform Act of 2002 (BCRA). The BCRA made certain changes to the Federal Elections Commission Act of 1971, including increasing the annual aggregate limit on contributions to federal candidates and committees from \$25,000 to \$95,000.

Under Section 402(a)(2)(B) and 307(e) of the BCRA, the provisions pertaining to contribution limits did not take effect until January 1, 2003. Accordingly, all contributions made by Mr. Abramoff to federal candidates and committees in calendar year 2002 are subject to the \$25,000 aggregate limit applicable prior to the BCRA's passage.

RELIEF

13. TheRestofUs.org respectfully requests that the Federal Elections Commission investigate this matter and take appropriate enforcement action.



Edward Wigglesworth, analyst
TheRestofUs.org
1107 9th Street, Suite 601
Sacramento, CA 95814
916-446-4741

CALIFORNIA JURAT WITH AFFIANT STATEMENT

State of California

County of

Sacramento

} ss.

☒ See Attached Document (Notary to cross out lines 1-6 below)

☐ See Statement Below (Lines 1-5 to be completed only by document signer[s], not Notary)

Signature of Document Signer No. 1

Signature of Document Signer No. 2 (if any)

Subscribed and sworn to (or affirmed) before me on this

14 day of February, 2006, by

(1) Edward Wigglesworth
Name of Signer

☐ Personally known to me

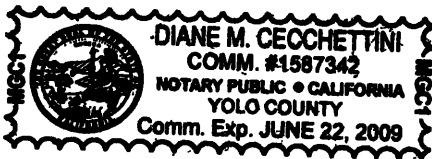
☒ Proved to me on the basis of satisfactory evidence to be the person who appeared before me (.) (.)

(and

(2) None
Name of Signer

☒ Personally known to me

☐ Proved to me on the basis of satisfactory evidence to be the person who appeared before me.)



Place Notary Seal Above

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Further Description of Any Attached Document

Title or Type of Document: FEC Complaint

Document Date: 2/17/06 Number of Pages: 4

Signer(s) Other Than Named Above None

RIGHT THUMBPRINT OF SIGNER #1
Top of thumb here

RIGHT THUMBPRINT OF SIGNER #2
Top of thumb here

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